

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE

JULIANN APELT a/k/a
JULIANN O'BRIEN, a/k/a
JULIANN KOWALKO

Debtors

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CHAPTER 13

CASE NO: 15-12313SR

**CERTIFICATION OF NO RESPONSE TO
MOTION TO MODIFY PLAN POST-CONFIRMATION**

The Debtor, through counsel, hereby avers:

1. On August 26, 2016, Debtor filed the above-captioned motion to modify the confirmed Chapter 13 Plan (the "Motion").
2. On August 26, 2016, the Motion and Notice of Motion was served on the Debtor, Standing Chapter 13 Trustee, and United States Trustee.
3. Pursuant to Local Bankruptcy Rule 9014-3(i), any response to the Motion was due on September 9, 2016
4. As of this date, no response has been filed to the Motion.

WHEREFORE, Debtor prays that the Court enter an order granting the relief requested in the Motion.

/s/ Alfonso Madrid
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